

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Patrick Berry, Henrietta Brown, Nadine Little, Dennis Barrow, Virginia Roy, Joel Westvig, Daniel Huiting, *on behalf of themselves and a class of similarly-situated individuals*; and ZACAH,

Plaintiffs,

vs.

Hennepin County; Hennepin County Sheriff Dawanna Witt, *in her official capacity*; City of Minneapolis; Minneapolis Mayor Jacob Frey, *in his individual and official capacity*; current Minneapolis Chief of Police Brian O'Hara, *in his official capacity*; former Minneapolis Chief of Police Medaria Arradondo, *in his individual capacity*; Minneapolis Park and Recreation Board; Police Officers John Does; and Police Officer Jane Does,

Defendants.

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Case No. 20-CV-02189-WMW-JFD

District Judge Wilhelmina M. Wright  
Magistrate Judge John F. Docherty

**DECLARATION OF  
LIUDMILA TRANDAFILAVA**

I, Liudmila Trandafilava, make this declaration pursuant to 28 U.S.C. § 1746.

1. I am the Senior Administrative Manager, Uniformed Operations of Hennepin County's Security Division. The Security Division provides patrol and security services to various facilities owned and leased by the County. I started working for the County in February 2017. In my current role, I oversee uniformed security operations, including the Security Operations Center, Patrol, and administrative matters such as budget and contract management.

2. In the spring of 2020, an encampment of people experiencing homelessness began to develop along the Midtown Greenway, a 5.5-mile-long corridor through the center of Minneapolis, which is currently used for a bike and walking trail.

3. During the spring, summer, and fall of 2020, County workers—including Security officers—visited the Greenway encampment routinely, sometimes daily, tracking the number and location of tents. County workers—again, including Security officers—got to know each camper in the encampment and worked with them individually to try to help campers to move to safe and secure shelter outside of an encampment and to arrange for transportation to that shelter. Security officers also passed out water and snacks, and they provided information about shelter and other resources, such as showers and food shelves, during these visits. Information about shelter and services was provided orally and in writing (in two languages), and security officers sometimes made calls on behalf of individuals to help those individuals connect with services.

4. Due to persistent health and safety threats over time, the County decided to close the Greenway encampment in late 2020. Weeks before the closure, County workers began to tell individuals in the encampment that the County would close the encampment. On December 15, the County gave each camper formal, written notice that the encampment would be closed and that campers should arrange to move their belongings out of the encampment by December 17.

5. The closure of the Greenway encampment took place on the morning of December 18, 2020. I participated in planning for the Greenway closure, and I was present on the Greenway when the closure occurred. The County's work relating to the closure was

overseen by Lisa Cerney, who is the Assistant County Administrator of Public Works and the Deputy Executive Director of the Hennepin County Regional Railroad Authority, which owns the land on which the Greenway sits.

6. On the day of the closure, County employees engaged with each camper on the Greenway. They informed campers that the encampment was closing and offered shelter and services to campers (which were accepted by a few campers). County workers also worked with campers to determine which belongings campers wanted to keep and which belongings they wanted to leave behind. They offered property storage (which no camper accepted on that day) and worked with each camper to allow sufficient time to pack and move their belongings. I and others passed out gloves, socks, masks, and transit passes to people in the encampment. We also offered rideshare rides.

7. Multiple County departments were involved in the closure, including Human Services, Public Works, Security, and the Sheriff's Office. The role of County Security officers and Hennepin County Sheriff's Office personnel on the day of the closure was to ensure the safety of campers, County workers, contractors, and the public—including neighbors, bystanders, volunteers, and activists. Neither Hennepin County Security officers nor Sheriff's Office personnel used force, made arrests, or handled campers' personal possessions during the Greenway encampment closure.

8. Since the closure of the Greenway encampment, the County has used a proactive approach to prevent encampments from forming on its property. When County Security staff—who patrol County property, including the Greenway—encounter any tent on County land, staff immediately inform the tent's occupants that camping or sleeping on

County property is not permitted and ask any occupants to remove the tent and their belongings. Staff also provide the tent's occupants with information on resources for people experiencing homelessness, including information about shelter options, day services, meals and showers, and medical and mental health services. They also provide water and snacks, and they perform welfare checks to make sure campers are safe. This strategy has been very effective at preventing encampments on County property from forming or growing; every single person the County has encountered has disassembled their tent and moved on. At present, there are no encampments on County property.

9. The County intends to continue its person-first and trauma-informed approach to people camping on County land, working with individuals experiencing homelessness to locate shelter, while also enforcing the County's prohibition on sleeping on County property. As a result, the County does not anticipate that encampments will return to County property.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2023.

s/ Liudmila Trandafilava  
Liudmila Trandafilava  
Hennepin County Security Division